

## **EXHIBIT C**

Excerpts from the April 19, 2022 Deposition of Dr. Ruoff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION  
CIVIL ACTION NO. 3:21-cv-03302-JMC-TJH-RMG

THE SOUTH CAROLINA STATE )  
CONFERENCE OF THE NAACP, )

and )

TAIWAN SCOTT, on behalf of )  
himself and all other similarly )  
situated persons, )

Plaintiffs, )

v. )

HENRY D. MCMASTER, in his )  
official capacity as Governor )  
of South Carolina; THOMAS C. )  
ALEXANDER, in his official )  
capacity as President of the )  
Senate; LUKE A. RANKIN, in his )  
official capacity as Chairman )  
of the Senate Judiciary )  
Committee; JAMES H. LUCAS, in )  
his official capacity as Speaker )  
of the House of Representatives; )  
CHRIS MURPHY, in his official )  
capacity as Chairman of the )  
House of Representatives )  
Judiciary Committee; WALLACE )  
H. JORDAN, in his official )  
capacity as Chairman of the )  
House of Representatives )  
Elections Law Subcommittee; )  
HOWARD KNAPP, in his official )  
capacity as interim Executive )  
Director of the South Carolina )  
State Election Commission; JOHN )  
WELLS, Chair, JOANNE DAY, )  
CLIFFORD J. EDLER, LINDA MCCALL, )  
and SCOTT MOSELEY, in their )  
official capacities as members )  
of the South Carolina Election )  
Commission, )

Defendants. )

**DEPOSITION**

**OF**

**DR. JOHN CARL RUOFF**

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, the within cross-noticed deposition of **Dr. John Carl Ruoff** was taken by Counsel for Defendants James H. Lucas, Chris Murphy, and Wallace H. Jordan, cross-noticed by Plaintiffs' Counsel, at the hour of 10:04 a.m. on Tuesday, April 19, 2022, at the law offices of Nexsen Pruet, LLC, 1230 Main Street, Suite 700, Columbia, South Carolina, attended by counsel as follows:

**TIMMI A. PARRISH**  
**VERBATIM REPORTER**

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**WHITWORTH COURT REPORTING**

POST OFFICE BOX 551  
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1           how long have you been involved with them?

2           A.   Well, I've worked with the League on a legislative  
3           level for a number of years, but I became a member,  
4           I don't know, ten years ago maybe, in no small part  
5           because my wife was an officer in the local League.

6           Q.   Okay. And what kind of officer or what position was  
7           she with the League?

8           A.   She was the treasurer for the local League.

9           Q.   Okay. And that was local to which branch?

10          A.   Columbia.

11          Q.   Okay. And have you held any positions within the  
12          league?

13          A.   No, I mean, other than serving on a committee or  
14          two.

15          Q.   Okay. And do you recall what the names of those  
16          committees may have been?

17          A.   One of the areas I didn't list where I have some  
18          expertise is non-profit and tax exempt law and the  
19          -- I served on a committee that was looking at  
20          bylaws.

21          Q.   Okay. And, Doctor, with any of the organizations we  
22          just discussed, particularly the League of Women  
23          Voters, have you had any discussions with those  
24          organizations about the litigation surrounding this  
25          House plan?

1 A. I mean, there were discussions about coming  
2 litigation but not about this litigation.

3 Q. Okay. And when you say discussions about coming  
4 litigation, can you explain that a little bit for  
5 me?

6 A. Well, we all understood that, as happens in most  
7 states, the statewide litigation was likely to -- or  
8 the statewide redistricting was likely to end up in  
9 litigation of some form.

10 Q. Okay. And when you say we all understood, who is  
11 the "we" there that you're referring to?

12 A. I assumed everybody who works on redistricting  
13 understands that litigation is a proximate  
14 likelihood. It certainly has been in South Carolina  
15 over the last -- even before my time.

16 Q. I don't disagree with you, Doctor. Is it fair to  
17 say that you expected or the "we" that we talked  
18 about expected litigation to result from these plans  
19 long before the plans were ever enacted?

20 A. Well, it certainly was a possibility.

21 Q. Okay. So, I want to ask you a couple questions  
22 about The Ruoff Group.

23 A. You're looking at it.

24 Q. So it's just you, huh?

25 A. It's me.

1 else that you have any involvement with, with  
2 respect to this redistricting cycle?

3 **BY MR. ANDREWS:**

4 Object to the form. Go ahead.

5 **WITNESS ANSWERS:**

6 A. Other than the League. On behalf of the League I  
7 prepared a congressional district plan for Dick  
8 Harpootlian, but I never had any communications with  
9 Senator Harpootlian. And it was mainly they just --  
10 he just wanted a cleanup of our -- the congressional  
11 plan that the League had submitted to the Senate.

12 **EXAMINATION RESUMED BY MR. DIAMADUROS:**

13 Q. Okay. And who asked you to create that plan?

14 A. Lynn Teague.

15 Q. Okay. And you submitted that to the Senate?

16 A. I didn't submit it to the Senate. It was submitted  
17 to Dick Harpootlian.

18 Q. Okay. So, Doctor, I'm going to introduce, this next  
19 document as Exhibit Number 2.

20 (WHEREUPON, HOUSE DEFENDANTS' EXHIBIT NUMBER 2  
21 WAS MARKED FOR IDENTIFICATION PURPOSES, EMAIL  
22 EXCHANGE.)

23 **EXAMINATION RESUMED BY MR. DIAMADUROS:**

24 Q. I'll give you a chance to review it. Just let me  
25 know when you've reviewed it.